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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Alyssia Nungaray, a minor, by and through  
her parents, Fernanda Jiminez and Adan  
Nungaray,

Plaintiffs,

v.

Pokroy Medical Group of Nevada, LTD., *et*  
*al.*,

Defendants.

Case No. 2:25-cv-00014-JAD-MDC

**Stipulation to Extend United States'  
Deadline to File Reply in support of its  
Motion to Dismiss**

**(First Request)**

[ECF No. 36]

Plaintiffs, Fernanda Jiminez and Adan Nungaray, through counsel and the United States of America, on behalf of Federal Defendant, through undersigned counsel, hereby agree and stipulate to extend the deadline to file Federal Defendant's Reply in support of their Motion to Dismiss (ECF No. 27) from April 23, 2025 to April 30, 2025. The parties enter into this stipulation based on the following:

1. Federal Defendants filed its Motion to Dismiss on April 2, 2025 (ECF No. 27).

2. Plaintiff's filed their Opposition to Federal Defendant's Motion to Dismiss Complaint on April 16, 2025. (ECF No. 35).

3. The current deadline for the United States to reply to the Motion to Dismiss is April 23, 2025. (ECF No. 35).

1 Plaintiff and the United States, through undersigned counsel, agree and stipulate  
2 that the United States' time to reply shall be extended through April 30, 2025. This is the  
3 first request for an extension of time.

4 The extension of time is necessary for the United States' counsel to accommodate  
5 her workload in other cases.

6 Therefore, the parties request that the Court extend the deadline for the United  
7 States to file their Reply in support of their Motion to Dismiss through April 30, 2025.

8 This stipulated request is filed in good faith and not for the purpose of undue delay.

9 Respectfully submitted this 22nd day of April 2025.

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11 BREEDEN & ASSOCIATES, PLLC

SIGAL CHATTAH  
United States Attorney

12  
13 /s/ Adam J. Breeden  
ADAM J. BREEDEN, ESQ.  
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14 7432 W. Sahara Ave., Suite 101  
Las Vegas, Nevada 89117

/s/ Karissa D. Neff  
KARISSA D. NEFF  
Assistant United States Attorney

*Attorneys for the United States*

15  
16 *Attorney for Plaintiff*

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18 **IT IS SO ORDERED:**

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UNITED STATES DISTRICT JUDGE

21 DATED: April 23, 2025  
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